

Number Portability Declaratory Ruling

T-Mobile USA, Inc.
Sprint Nextel Corp.

CC Docket No. 95-116
DA 07-39

June 6, 2007

Benefits of Number Porting:

- LNP serves the public interest by fostering competition and enhancing consumer choice.
- Full benefits of LNP will not be realized unless *all* providers facilitate, rather than burden, the porting process.

FCC Precedent:

- FCC definition of LNP: Consumers can change carriers while keeping their numbers *as easily as* they can without keeping numbers.
- FCC has clarified that carriers are precluded “from imposing restrictions on porting beyond necessary customer validation procedures.”
- FCC held that “carriers need only share basic contact and technical information sufficient to perform the port.”

The Problem:

- ILECs obstruct and delay porting process by demanding information far beyond that needed to validate the customer.
- Port request process is unreasonable:
 - Change LSRs on regular basis.
 - Different and multiple forms within a company.
 - Validate on 20-plus data fields.
 - Reject port requests when they do not match ILECs' own customer service records (CSRs) exactly.

Broad Industry Consensus of Problem:

- ❑ **Charter:** Port fallout rate of over 15%
- ❑ **Comcast:** Bundled installs take over a week.
- ❑ **Leap:** Customers get so irritated with delay they take temporary number or cancel port altogether.
- ❑ **MetroPCS:** 4Q 2006, VZ rejected almost 100% of porting forms on first submission.
- ❑ **T-Mobile:** 50% of intermodal ports require supplemental request.
- ❑ **Sprint:** 30% port cancellation rate.
- ❑ **US Cellular:** Quarter of port requests fail (40% of those due to information not matching CSRs).

Examples:

- **VZ** requires porting-in carriers to “pre-order” CSR and use precisely same format on LSR.
- **VZ East and VZ West** use different forms and each requires completion of 3 forms.
- **Qwest** requires additional “address validation step” before carriers can “preorder” CSRs.
- **Embarq** demands street number, name, city and state, which invites errors.
- **AT&T** treats porting the same as service ordering and acknowledges that it sometimes engages in serial rejections of porting requests.

Compare Wireless Porting:

- Wireless validates port request using solely:
 - Telephone number
 - Account number
 - Password (if applicable)
- Wireless port request usually accepted or denied within 30 minutes.
- Entire wireless port activation generally completed in 2.5 **hours**.
- Porting in from an ILEC, by contrast, often takes a **week or more**.

State Commissions agree:

- ❑ **Nebraska:** Port delays cost consumers time and money.
- ❑ **California:** It is “difficult to fathom how this much information could be required.”
- ❑ **Iowa:** ILECs burden porting process to thwart competition from wireless.
- ❑ **NARUC 2007 Resolution:** Adoption of simple and uniform porting process will facilitate consumer choice.

The Solution:

- FCC should clarify that existing rules preclude carriers from demanding information in excess of minimum necessary to validate customer.
- “Necessary” validation information for *simple* ports should be no more than 4-5 fields:
 - Telephone number
 - Account number
 - Zip code
 - Password (if applicable).

No Obstacle to Solution:

- Request not part of any pending proceeding.
- Industry groups unsuccessful in simplifying intermodal porting request process.
- FCC complaint mechanism and company-specific escalation are costly and slow.
- No increased risk of inadvertent porting.

Simple Fix:

- Petition seeks clarification that *existing* rules prohibit ILECs from demanding information beyond that which is necessary.
- This “simple fix” would promote competition and enhance consumer choice.